

UNITED STATES OF AMERICA

v.

Manning, Bradley E.
PFC, U.S. Army,
HHC, U.S. Army Garrison,
Joint Base Myer-Henderson Hall
Fort Myer, Virginia 22211

STIPULATION OF
EXPECTED TESTIMONY

CW5 John Larue

10 June 2013

It is hereby agreed by the Accused, Defense Counsel, and Trial Counsel, that if CW5 John Larue were present to testify during the merits and pre-sentencing phases of this court-martial, he would testify substantially as follows.

1. I am currently assigned to the Pentagon. I have 22 years of experience flying helicopters for the United States Army. I have been a pilot since 1984. I entered active duty in 1990. From 1990 until 1 January 2011, I was an Apache helicopter pilot. After 1 January 2011, I became a general aviation officer in light of my promotion to CW5.

2. In 1991, I was a Cobra pilot. In 1993, I qualified to fly the Apache AH-64 A (AH-64A). In 1998, I qualified as an instructor pilot on the AH-64A. I have flown the AH-64A in combat in Bosnia. In 2000, I qualified to fly the AH-64D. Later in 2000, I qualified as an instructor pilot on the AH-64D. I deployed to Kuwait in 2002 as part of Operation Desert Spring. I deployed to Iraq in 2003, and I flew in combat as an AH-64D pilot in Operation Iraqi Freedom. I deployed to Afghanistan in 2008 and flew combat missions during that deployment. In sum, I have approximately 3000 hours of flight time and approximately 200 hours of combat flight time.

3. From 2004-2008, I worked at Army Tactics Development at Fort Rucker. In this position, I developed combat tactics. In particular, I developed tactics driven by equipment, especially survivability equipment. At Army Tactics Development, I field tested equipment, verified the results, and developed tactics, techniques, and procedures (TTPs) in accordance with the test results.

4. From 2008-2009, I was the tactical operations officer for the brigade aviation element of the 3rd Brigade Combat Team of 11D. As the tactical operations officer, I managed all attack and reconnaissance aircraft in eastern Afghanistan.

5. Since 2009, I have been stationed at the Pentagon and worked at Department of the Army Military Operations-Aviation (DAMO-AV). At DAMO-AV, I work in the G-3/5/7, which manages Army aviation. I am the aircraft survivability equipment action officer at DAMO-AV.

6. The AH-64D is an upgraded version of the AH-64A. The AH-64D uses digital displays whereas the AH-64A relies on analog displays.

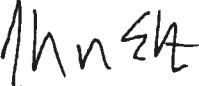
7. I am familiar with the video file named "12 JUL 07 CZ ENGAGEMENT ZONE 30 GC Anyone.avi" (Apache video) because I reviewed the video. I reviewed the Apache video for sensitive information, to include systems capabilities and communications. I relied on my experience as a pilot, instructor pilot, and as an officer in charge of developing aviation

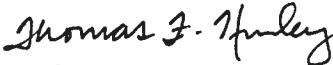
defensive technologies. I also relied on the Noble Eagle classification guide, which set classification standards for all helicopter videos in OPERATION ENDURING FREEDOM and then later in OPERATION IRAQI FREEDOM. Finally, I considered the security classification guide for the Apache helicopter itself. I did not consider any open source reporting on this particular incident. I also did not consider the fact that I have seen similar videos with the sensitive information visible on the internet. This video is **Prosecution Exhibit 15 for Identification**.


8. The Apache video shows the display of an AH-64D. I know the display is of an AH-64D because it is digital, and I have extensive experience using the AH-64D digital display. The Apache video shows the high-action display. The high action display shows the use of a laser for ranging, altitude and air speed. The laser also shows angles of engagement. The ranges and attack approaches are TTPs. Based on my experience and training, TTPs are sensitive Army aviation information. Adversarial forces who know TTPs could be able to anticipate United States operations and the adversarial forces will be able to plan more effective attacks as a result. The high action display also shows the heading tape, which reveals the sensor and the sensor's acquisition of targets and other information. This display of the sensor in action could be used to determine the limitations of the sensor's capabilities. Based on my experience and training, the sensor's capabilities are sensitive Army aviation information. The sensor also reveals the position of the helicopter during an operation, which could be used to determine more aspects of TTPs. TTPs are a puzzle, and revealing any piece could make solving the puzzle easier for an adversary.

9. Videos of Army helicopter combat missions are recorded regularly for training and reviewed for effectiveness. As a helicopter pilot, I have been taught not to release the videos to the public nor to reveal the sensitive information contained therein. As a helicopter instructor pilot, I have instructed students not to release the video nor to reveal the sensitive information contained therein.

10. Helicopter units have procedures for protecting the videos and the information the videos contain. In my experience under the procedures employed by the units, all videos requiring review are turned into flight operations by pilots or support personnel. The videos are reviewed and used again as needed. Thus, the information may be recorded over but it is not physically released. If a video contains information that requires being saved, the video is ported over to a system on the SIPRNET. After the information is secured on the SIPRNET, the tape may be recorded over again. In my experience, videos that are physically released are sanitized for the types of information described in paragraph 8 of this stipulation before the video is publicly released. The actual video footage is not classified. Coupling the video footage with the data makes the information sensitive.


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